

Luxottica Submission on OBA Proposal to make Ocular Therapeutics Endorsement Compulsory for Optometric Registration in Australia.

21 February 2011



Summary

Optometrists are fundamental to Luxottica's business and our ability to deliver the best eye care services possible to all Australians. We are focused strongly on the professional development of our Optometrists and the impact this has on them being able to provide excellence in eyecare to all Australians.

- In line with the Australian Optometry Association (OAA), we are very confident that optometrists who do not have the Ocular Therapeutics (OT) endorsement provide outstanding eyecare to their patients.
- Luxottica supports the view that Optometrists without an OT endorsement should be able to practise, as they do now, with a registration stating "not endorsed for ocular therapeutics".
- We do not support currently registered Optometrists being forced to obtain OT endorsement. And, do not agree setting any time limit for obtaining endorsement.
- We do not support overseas qualified experienced Optometrists being required to obtain OT endorsement for general registration. These Optometrists should be treated similarly to Australian optometrists who do not have an OT endorsement.
- In line with the OAA, Luxottica believes that registration changes should occur in a way that is fair and reasonable for all Optometrists.

Specific Comments to OBA questions

1. *Is there any public benefit in requiring all optometrists to be eligible for therapeutic endorsement?*

Rural – there may be some benefit in making endorsement compulsory in rural areas. However, this is likely to also reduce rural optometry coverage, with many rural practitioners being older. Those who do not have the endorsement may resist being effectively forced to re-skill.

City – This is less of an issue in CBD and surrounding areas, which typically would have Ophthalmologists in nearby locations.

2. *Is such a requirement a reasonable expectation of optometrists?*

With new graduates already developing and acquiring new skills, this could be considered as reasonable. However, for older, experienced Optometrists, I don't believe this is a fair expectation. The majority of older optometrists provide outstanding eyecare using their current knowledge and experience, combined with appropriate relationships with medical and other health care providers.



3. *Should therapeutic qualifications be a requirement for practice as an optometrist in Australia?*

For New Optometry graduates, therapeutic qualifications should be a requirement to register and practice as an Optometrist.

For currently registered Optometrists, OT should remain voluntary. We encourage and support all our Optometrists to stay at the cutting edge of professional practice. However it is important they are able to make their own decision around individual professional development

4. *If so, should there be a period of grace to allow all registered optometrists to gain the necessary qualifications and how long should the period be?*

Luxottica does not support a time limit for registrations. My recommendation would be that current registration and practice standards should be 'grandfathered' indefinitely, for those individual optometrists without OT qualifications.

5. *To be consistent with Australian graduates, should overseas-trained optometrists applying for general registration in Australia for the first time be required to complete appropriate competency assessments for therapeutic practice from 2014?*

Overseas trained optometrists should be allowed to demonstrate competency through the OCANZ examinations and then gain general registration similar to non OT qualified experienced Australian optometrists.

6. *Should optometrists holding general registration practising in non-clinical roles, such as management, administration, education, research, advisory, regulatory or policy development roles, be required to hold therapeutic qualifications?*

No. For currently registered optometrists OT should be voluntary. However it is important they are able to make their own decision around individual professional development

7. *Are there impediments to the proposal that need to be considered and if so, can these be overcome?*

Luxottica has employed graduates from the optometry schools of Australia and New Zealand for many years. We are very satisfied with their output and their ability to service the training needs of the profession.

Our recommendation regarding Ocular Therapeutics is that the universities provide access and sufficient clinical training places to cover the need generated by any changes in legislation.

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